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February 25, 2008

FILED/ACCEPTED
FEB 26 2008

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Supplemental Response to Staff Inquiry, MB Docket No. 07-213

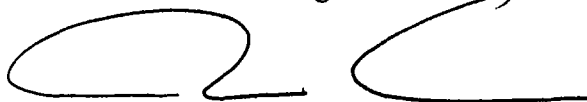
Dear Ms. Dortch:

On behalf of BTNC, Inc., which filed the Request for Temporary Waiver in the above-referenced matter, this letter responds to a February 21, 2008 request from Rosalee Chiara and Maureen McCarthy of the Commission's staff for supplemental information regarding the small business size status of BTNC, Inc.

If there are any other questions regarding these matters, please contact us.

Very truly yours,

Davis Wright Tremaine LLP



Paul Glist

cc: Attached service list
Rosalee Chiara
Maureen McCarthy

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of

BTNC, INC.

Request for Temporary Waiver

MM Docket No. 07-213

To: Mass Media Bureau

DECLARATION OF Robert Brillante re: Response to Staff Inquiry

My name is Robert Brillante. I am Vice President of BTNC, Inc., which is the owner and provider of the Black Television News Channel. By virtue of my position, I am familiar with the facts set forth in the "Response to Staff Inquiry," MB Docket No. 07-213 ("Response") filed with the Commission on February 7, 2008.

In response to a February 21, 2008 request from Ms. Rosalee Chiara of the Commission's staff concerning a statement in paragraph 2 of the Response about BTNC, Inc.'s size, I am confirming that BTNC, Inc.'s revenues are below the Small Business Administration's (SBA) small business size thresholds applicable to "Cable and Other Satellite Subscription Services."

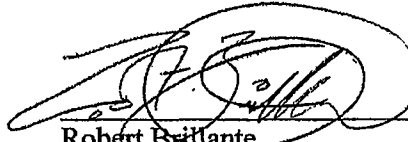
The SBA's size standards used to define small business concerns are identified by the "North American Industry Classification System" codes (NAICS) and are expressed either in terms of the maximum number of employees or the maximum annual receipts in millions of dollars allowed for a concern and its affiliates. Section 121.101. The size thresholds for *Cable and Other Satellite Subscription Services* contained under the NAICS chart at Sector 51 ("Information"), under Subsector 515 ("*Broadcasting (except Internet)*") are a maximum of \$13.5 million. See Section 121.201

Section 121.104 defines "receipts" as "total income...plus cost of goods sold" as those terms are defined by the Internal Revenue Service (IRS). The annual receipts of a concern, such as BTNC, Inc., that has been in business for less than three complete fiscal years means the total receipts for the period in which the concern has been in business divided by the number of weeks in business, multiplied by 52.

Based on the foregoing, I declare under penalty of perjury that BTNC, Inc.'s revenues are well below the maximum limits established by the SBA under the above provisions.

I further declare under penalty of perjury that the SBA's size thresholds also are satisfied with respect to both BTNC, Inc, and Black Television News Channel, LLC, collectively, in the event that BTNC, Inc and Black Television News Channel, LLC may be considered "affiliates" based on the SBA's definitions of "affiliation" under Section 121.103.

I declare under penalty of perjury that the facts contained herein are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read 'R. Brillante', is written over a horizontal line.

Robert Brillante
Vice President
BTNC, Inc.

Executed on: February 25, 2008

CERTIFICATE OF SERVICE

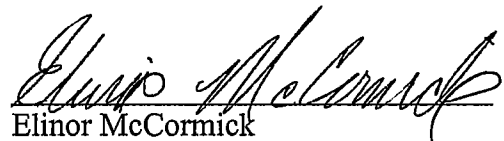
I hereby certify that on this 26th day of February, 2008, a copy of the attached "Supplemental Response to Staff Inquiry", which was filed on February 25, 2008, was served First-Class U.S. Mail, postage prepaid, to counsel of record, at the following addresses:

Marlene H. Dortch, Secretary**
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